

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CHARLES WILLIAMS

Plaintiff

Docket No. 07 cv 7720
(CM) (RLE)

-against-

AFFIDAVIT

PALLADIA, INC. and CORINE WORKMAN

Defendants
-----X

STATE OF NEW YORK)
):ss
COUNTY OF NEW YORK)

JUDY ARCHER, being duly sworn deposes and says:

1. I am the Sr. Director of Human Resources for defendant Palladia, Inc. although I did not hold that position at the time Mr. Williams was employed or terminated.

2. The following annexed Exhibits are from the Personnel Files of various employees kept in the offices of Palladia's Human Resources Department or are from the Palladia Personnel Manual.

Exhibit	Description
I	Charles Williams Application Letter
J	Charles Williams Personnel Requisition
K	Charles Williams signed receipt for Personnel

Manual

L	House Monitor Job Description
M	Letter to Charles Williams dated June 27, 2006
N	Employee Performance Discussion Form dated July 5, 2006
O	Security Log for October 31, 2006
P	Charles Williams Time Sheet for week of October 26 th through November 1, 2006.
Q	Employee Performance Improvement Plan signed November 1, 2006
R	November 2, 2006 termination letter to Charles Williams
S	Section 12.2 of Palladia's Personnel Manual
T	November 10, 2006 letter from Charles Williams to George Lino
U	November 16, 2006 letter from George Lino to Charles Williams
V	September 9, 2005 Recommendation for Termination of Sim Hartfield
W	September 13, 2005 Termination Letter for Sim Hartfield.
X	June 14, 2006 letter to Ramon Luna
Y	June 19, 2006 Termination Letter to Ramon Luna
Z	Sections 6.3 & 6.4 of Palladia's Personnel Manual

AA Section 4.3 of Palladia's Personnel Manual

AB Copy of e-mail dated September 1, 2006 from
Corinne Workman to George Lino re: Michael
Williams nocall/noshow

AC Section 12.2 of Palladia's Personnel Manual

AD September 5, 2006 Termination Letter for Michael
Williams

AE July 12, 2007 e-mail relating to Harry Pharr
resignation


AF June 29, 2005 resignation letter of Jonathan Thomas

AG January 30, 2006 resignation e-mail from Jose
Pacheco

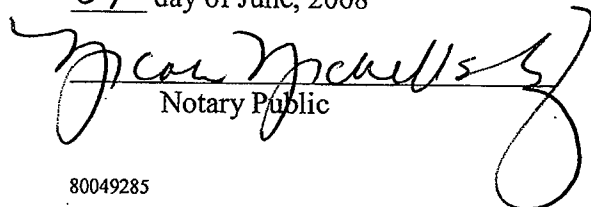
AH Memorandum from Edward J. Slepian to Lana
Hallstein re: transfer of Patrick Irby.

AI October 31, 2007 decision of Administrative Law
Judge

WHEREFORE, for the reasons set forth in the annexed affidavits and
defendants' memorandum of law, defendants' motion to dismiss the complaint should be
granted in its entirety.


Judy Archer

Sworn to before me this
24 day of June, 2008


Notary Public

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3

